

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**In re:**

**CIRCUIT CITY STORES, INC., et al.**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 08-35653-KRH**

**Jointly Administered**

**MOTION PURSUANT TO  
LBR 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

COMES NOW Jennifer McLain McLemore (“Movant”) of Christian & Barton LLP, a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and hereby moves the Court pursuant to this Motion (the “Motion”) for the entry of an Order substantially in the form of Exhibit A authorizing Paul J. Pascuzzi (“Mr. Pascuzzi”), a lawyer whose address is 400 Capitol Mall, Suite 1450, Sacramento, CA 95814; to appear and practice *pro hac vice* on behalf of The McClatchy Company, Charlotte Observer, Myrtle Beach Sun News, Columbia State, Idaho Statesman, Kansas City Star, Tacoma News Inc, Wichita Eagle,

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<sup>1</sup> The Debtors and their respective case numbers are as follows: Circuit City Stores, Inc. (08-35653); Circuit City Stores West Coast, Inc. (08-35654); InterTAN, Inc. (08-35655); Ventoux International, Inc. (08-35656); Circuit City Purchasing Company, LLC (08-35657); CC Aviation, LLC (08-35658); CC Distribution Company of Virginia, Inc. (08-35659); Circuit City Properties, LLC (08-35661); Kinzer Technology, LLC (08-35663); Abbott Advertising Agency, Inc. (08-35665); Patapsco Designs, Inc. (08-35667); Sky Venture Corp. (08-35668); Prahs, Inc. (08-35670); XSStuff, LLC (08-35669); Mayland MN, LLC (08-35666); Courchevel, LLC (n/a); Orbyx Electronics, LLC (08-35664); and Circuit City Stores PR, LLC (08-35660).

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Augustus C. Epps, Jr., Esquire (VSB No. 13254)  
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Counsel for the McClatchy Company, Charlotte Observer, Myrtle Beach Sun News, Columbia State, Idaho Statesman, Kansas City Star, Tacoma News Inc, Wichita Eagle, Fresno Bee, Lexington Herald-Leader, Miami Herald, Sacramento Bee, and the San Luis Obispo Tribune

Fresno Bee, Lexington Herald-Leader, Miami Herald, Sacramento Bee, and the San Luis Obispo Tribune, named Defendants in the above-captioned matter now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related litigation or proceedings pursuant to LBR 2090-1(E)(2). In support of this Motion, the Movant states as follows:

1. Mr. Pascuzzi is admitted, practicing and in good standing as a member of the bar of the State of California. He is admitted to practice before the United States District Court for the Eastern District of California. Mr. Pascuzzi has been practicing law since 1990. There are no disciplinary proceedings pending against Mr. Pascuzzi.

2. Pursuant to LBR 2090-1(E)(2), “an attorney from another State . . . may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar.”

3. Movant requests the Court to allow Mr. Pascuzzi to file pleadings and to appear at hearings in these Chapter 11 cases.

4. Notice of this Motion has been given to the Plaintiff. In light of the nature of the relief requested, Movant respectfully submits that no further notice is required.

5. An Application pursuant to LBR2090-1(E)(2)(a) is appended to this Motion.

**WHEREFORE**, the Movant respectfully requests that the Court enter an Order substantially in the form attached as Exhibit A (a) authorizing Mr. Pascuzzi to appear and practice *pro hac vice* on behalf of the McClatchy Company, Charlotte Observer, Myrtle Beach Sun News, Columbia State, Idaho Statesman, Kansas City Star, Tacoma News Inc, Wichita

Eagle, Fresno Bee, Lexington Herald-Leader, Miami Herald, Sacramento Bee, and the San Luis Obispo Tribune and (b) granting such other and further relief as is just and proper.

Dated: February 2, 2011

Respectfully submitted,

/s/ Jennifer M. McLemore

Jennifer M. McLemore

Augustus C. Epps, Jr., Esquire (VSB No. 13254)  
Michael D. Mueller, Esquire (VSB No. 38216)  
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Counsel to for McClatchy Company, Charlotte  
Observer, Myrtle Beach Sun News, Columbia State,  
Idaho Statesman, Kansas City Star, Tacoma News  
Inc, Wichita Eagle, Fresno Bee, Lexington Herald-  
Leader, Miami Herald, Sacramento Bee, and the  
San Luis Obispo Tribune

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of February, 2011, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Paul J. Pascuzzi was served on all persons receiving electronic notice in this adversary proceeding to the following:

Lynn L. Tavenner, Esquire  
Paula S. Beran, Esquire  
Tavenner & Beran, PLC  
20 North Eighth Street, 2<sup>nd</sup> Floor  
Richmond, Virginia 23219

Jeffrey N. Pomerantz, Esquire  
Andrew W. Caine, Esquire  
Pachulski Stang Siehl & Jones LLP  
10100 Santa Monica Boulevard  
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John A. Morris, Esquire  
Pachulski Stang Siehl & Jones LLP  
780 Third Avenue, 36<sup>th</sup> Floor  
New York, New York 10017

Robert B. Van Arsdale  
Office of the United States Trustee  
701 East Broad Street, Suite 4304  
Richmond, Virginia 23219

/s/ Jennifer M. McLemore  
Jennifer M. McLemore

1123223

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653-KRH, \* Case Name Circuit City Stores, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Paul Joseph Pascuzzi  
Bar Identification Number 148810 State California  
Firm Name Felderstein Fitzgerald Willoughby & Pascuzzi LLP  
Firm Phone # 916-329-7400 Direct Dial # 916-329-7400, extension 222 FAX # 916-329-7435  
E-Mail Address ppascuzzi@ffwplaw.com  
Office Mailing Address 400 Capitol Mall, Suite 1450, Sacramento, CA 95814  
Name(s) of federal court(s) in which I have been admitted Eastern District of California

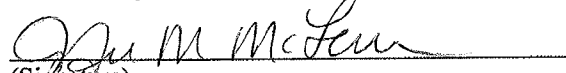
I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

  
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

  
(Signature)

2/2/11  
(Date)

Jennifer M. McLenore  
(Typed or Printed Name)

\**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re:

CIRCUIT CITY STORES, INC., et al.

Debtors.<sup>1</sup>

Chapter 11

Case No. 08-35653-KRH

Jointly Administered

**ORDER GRANTING MOTION PURSUANT TO  
LBR 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Upon the Motion (the “Motion”) of Jennifer McLain McLemore, for the admission *pro hac vice* of Paul J. Pascuzzi (“Mr. Pascuzzi”), a lawyer whose address is 400 Capitol Mall, Suite 1450, Sacramento, CA 95814; it appearing that the relief requested is in the best interests of the Debtors’ estates, their creditors and other parties in interest; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED:

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<sup>1</sup> The Debtors and their respective case numbers are as follows: Circuit City Stores, Inc. (08-35653); Circuit City Stores West Coast, Inc. (08-35654); InterTAN, Inc. (08-35655); Ventoux International, Inc. (08-35656); Circuit City Purchasing Company, LLC (08-35657); CC Aviation, LLC (08-35658); CC Distribution Company of Virginia, Inc. (08-35659); Circuit City Properties, LLC (08-35661); Kinzer Technology, LLC (08-35663); Abbott Advertising Agency, Inc. (08-35665); Patapsco Designs, Inc. (08-35667); Sky Venture Corp. (08-35668); Prahs, Inc. (08-35670); XSstuff, LLC (08-35669); Mayland MN, LLC (08-35666); Courchevel, LLC (n/a); Orbyx Electronics, LLC (08-35664); and Circuit City Stores PR, LLC (08-35660).

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Counsel for the McClatchy Company, Charlotte  
Observer, Myrtle Beach Sun News, Columbia State,  
Idaho Statesman, Kansas City Star, Tacoma News  
Inc, Wichita Eagle, Fresno Bee, Lexington Herald-  
Leader, Miami Herald, Sacramento Bee, and the  
San Luis Obispo Tribune

1. The Motion is GRANTED.
2. Mr. Pascuzzi is authorized to appear and practice *pro hac vice* as counsel to the McClatchy Company, Charlotte Observer, Myrtle Beach Sun News, Columbia State, Idaho Statesman, Kansas City Star, Tacoma News Inc, Wichita Eagle, Fresno Bee, Lexington Herald-Leader, Miami Herald, Sacramento Bee, and the San Luis Obispo Tribune, in the above-captioned matter and all related adversary proceedings.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

ENTER:        /    /

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United States Bankruptcy Judge

I ask for this:

/s/ Jennifer M. McLemore

Augustus C. Epps, Jr., Esquire (VSB No. 13254)  
Michael D. Mueller, Esquire (VSB No. 38216)  
Jennifer M. McLemore, Esquire (VSB No. 47164)  
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**CERTIFICATE**

I hereby certify that the foregoing Order has been endorsed by all necessary parties.

/s/ Jennifer M. McLemore

Jennifer M. McLemore



**S E R V I C E L I S T**

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